

**Administrative Record Index  
for the  
STAUFFER CHEMICAL CO. (LEMOYNE PLANT) NPL Site  
(Operable Unit #1)**

**1.0 PRE-REMEDIAL****1.8 Preliminary Assessment Documents**

1. "Potential Hazardous Waste Site - Identification and Preliminary Assessment," Javier Colon, EPA Region IV. (December 13, 1979) Stauffer Chemical Co. sites.

**1.9 Site Inspection Documents**

1. "Hazardous Waste Site Investigation - Groundwater Monitoring - Stauffer Chemical Corporation - Axis and Bucks, Alabama," James Kopotic, EPA Region IV. (May 18, 1983) Investigation conducted October 12, 1982, through October 16, 1982.
2. "Potential Hazardous Waste Site - Site Inspection Report," Jennifer Scott-Simpson, EPA Region IV. (July 13, 1983) Stauffer Chemical Co. Axis Plant site.

**3.0 REMEDIAL INVESTIGATION (RI)****3.1 Correspondence**

1. Cross Reference: Letter from J.D. Sheehan, Stauffer Chemical Company, to James Orban, EPA Region IV. (December 21, 1984) Participation by Stauffer Chemical Company in a remedial investigation and feasibility study at Stauffer's Cold Creek plant. [Filed and cited in Entry Number 4 of 11. 9 POTENTIALLY RESPONSIBLE PARTIES (PRP) - PRP-Specific Correspondence]
2. Letter from Harold Taylor, EPA Region IV, to T.J. Sayers, Stauffer Chemical Company. (March 21, 1986) Modifications to the analytical and reporting procedures for the Remedial Investigation/Feasibility Study at the Stauffer Chemical Co. sites.
3. Letter from Patrick Tobin, EPA Region IV, to Steve Perry, Akzo Chemicals Inc. (August 23, 1988) Issuance of the attached "Notice of RCRA Final Permit Decision".

**3.2 Sampling and Analysis Data**

1. The Sampling and Analysis Data for the Remedial Investigation may be reviewed, by appointment only, at EPA Region IV, Atlanta, Georgia. (DATE UNKNOWN)
2. "Remedial Investigation/Feasibility Study - Cold Creek/LeMoyne Site - Sampling & Analysis Manual," Stauffer Chemical Company. (August 09, 1985) Note: The appendices to this manual have not been copied for the administrative record. They are contained within items 7, 8, 9, 11, and 31 in the Guidance Documents section of this index.
3. Letter from Horst Caspers, Stauffer Chemical Company, to Jim Orban, EPA Region IV. (November 18, 1985) Transmitting the attached pages updating the August 9, 1985, "Remedial Investigation/Feasibility Study - Cold Creek/LeMoyne Site - Sampling & Analysis Manual," Stauffer Chemical Company.
4. Letter from Horst Caspers, Stauffer Chemical Company, to Wade Knight, EPA Region IV. (April 25, 1986) Transmitting the attached revisions to analytical methods in the August 9, 1985, "Remedial Investigation/Feasibility Study - Cold Creek/LeMoyne Site - Sampling & Analysis Manual," Stauffer Chemical Company.

**3.4 Work Plans and Progress Reports**

1. "Final Work Plan for Stauffer Chemical Cold Creek and LeMoyne Sites - Remedial Investigation/Feasibility Study - Mobile County, Alabama - Volume I," Camp Dresser & McKee Inc. (August 27, 1985)

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**3.0 REMEDIAL INVESTIGATION (RI)**

**3.4 Work Plans and Progress Reports**

2. "Final Work Plan for Stauffer Chemical Cold Creek and LeMoyne Sites - Remedial Investigation/Feasibility Study - Mobile County, Alabama - Volume II," Camp Dresser & McKee Inc. (August 27, 1985)
3. "Amendment to Work Plan for Stauffer Chemical Company Sites - Mobile County, Alabama - Volume II," Camp Dresser & McKee Inc. (August 01, 1988)

**3.8 Interim Deliverables**

1. "Sensitive Receptor Report - Cold Creek/LeMoyne Remedial Investigation Study," Stauffer Chemical Company [?]. (September 05, 1986)

**3.9 Action and Decision Memoranda**

1. Memorandum from Thomas W. Devine, EPA Region IV to Charles R. Jeter, EPA Region IV. (October 31, 1984) Transmittal of Action Memorandum and Scope of Work for Remedial Investigation.

**3.10 Remedial Investigation (RI) Reports**

1. Letter from Thomas Sayers, Stauffer Chemical Company, to Thu Kim Dao, EPA Region IV. (February 20, 1987) Transmittal of the draft "Remedial Investigation Report for the Cold Creek/LeMoyne Site, Mobile County, Alabama".
2. Memorandum from Cody Jackson, Agency for Toxic Substances and Disease Registry, to Thu Kim Dao, EPA Region IV. (April 01, 1987) Comments on the draft "Remedial Investigation Report for the Cold Creek/LeMoyne Site, Mobile County, Alabama".
3. Letter from Thu Kim Dao, EPA Region IV, to Thomas Sayers, Stauffer Chemical Company. (May 19, 1987) Comments on the draft "Remedial Investigation Report for the Cold Creek/LeMoyne Site, Mobile County, Alabama".
4. Letter from Sylvie Olney and Wanda Ratliff, ERT for Akzo Chemicals Inc. and ICI Americas Inc., to Ellen VanDuzee, EPA Region IV. (January 27, 1988) Transmittal of the draft "Remedial Investigation Report for the Cold Creek/LeMoyne Site" (revision 2) and draft "Endangerment Assessment Report - Cold Creek/LeMoyne Site".
5. Letter from Wanda Ratliff, ERT for Akzo Chemicals Inc. and ICI Americas Inc., to Ellen VanDuzee, EPA Region IV. (February 09, 1988) Transmitting the attached corrected version of Appendix XXVI of the "Remedial Investigation Report for the Cold Creek/LeMoyne Site, Mobile County, Alabama".
6. Memorandum from Ellen VanDuzee, EPA Region IV, to Mariam Tehrani, Akzo Chemicals Inc. (February 17, 1988) Comments on the draft "Remedial Investigation Report for the Cold Creek/LeMoyne Site" (revision 2) and draft "Endangerment Assessment Report - Cold Creek/LeMoyne Site".
7. "Remedial Investigation Report for the Cold Creek/LeMoyne Site, Mobile County, Alabama - Final Report," Akzo Chemicals Inc., and ICI Americas. (May 1988) NOTE: DOCUMENT COVER IS DATED JANUARY 1988.
8. Letter from Charles Margin and Sylvie Olney, ERT for Akzo Chemicals Inc. and ICI Americas Inc., to Larry Meyer, EPA Region IV. (May 16, 1988) Responding to the February 17, 1988, comments from Ellen VanDuzee, EPA Region IV.

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**3.0 REMEDIAL INVESTIGATION (RI)****3.10 Remedial Investigation (RI) Reports**

9. Letter from Kurt Batsel, Camp Dresser & McKee Inc., to Larry Meyer, EPA Region IV. (July 15, 1988) Comments on the May 16, 1988, ERT response to EPA Region IV comments.
10. Letter from Lee Erickson, ICI Americas Inc., to Benjamin Moore, EPA Region IV. (September 22, 1988) Responding to EPA Region IV comments on the draft "Remedial Investigation Report for the Cold Creek/LeMoyne Site, Mobile County, Alabama" (revision 2).

**3.11 Health Assessments**

1. "Health Assessment for Stauffer Chemical Company National Priorities List (NPL) Sites, Mobile, Alabama," Agency for Toxic Substances and Disease Registry. (January 06, 1989)
2. Letter from Diane Scott, EPA Region IV, to Dan Cooper, State of Alabama Department of Environmental Management. (February 14, 1989) Transmittal of the Health Assessments for the Stauffer Chemical Co. sites.
3. Letter from Diane Scott, EPA Region IV, to James Hathcock, State of Alabama Department of Environmental Management. (February 14, 1989) Transmittal of the Health Assessments for the Stauffer Chemical Co. sites.

**3.12 Endangerment Assessments**

1. "Endangerment Assessment Report - Cold Creek/LeMoyne Site, Mobile County, Alabama - Draft," ERT for Akzo Chemicals Inc. and ICI Americas Inc. (January 1988)
2. Letter from E.R. Roach, U.S. Fish and Wildlife Service, to Ellen VanDuzee, EPA Region IV. (February 12, 1988) Comments on the January 1988 "Endangerment Assessment Report - Cold Creek/LeMoyne Site, Mobile County, Alabama - Draft," ERT for Akzo Chemicals Inc. and ICI Americas Inc.
3. "Endangerment Assessment Report - Cold Creek/LeMoyne Site, Mobile County, Alabama," ERT for Akzo Chemicals Inc. and ICI Americas Inc. (May 1988)
4. Cross Reference: Letter from Charles Margin and Sylvie Olney, ERT for Akzo Chemicals Inc. and ICI Americas Inc., to Larry Meyer, EPA Region IV. (May 16, 1988) Responding to the February 17, 1988, comments from Ellen VanDuzee, EPA Region IV. [Filed and cited in Entry Number 8 of 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]
5. Cross Reference: Letter from Kurt Batsel, Camp Dresser & McKee Inc., to Larry Meyer, EPA Region IV. (July 15, 1988) Comments on the May 16, 1988, ERT response to EPA Region IV comments. [Filed and cited in Entry Number 9 of 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]

**4.0 FEASIBILITY STUDY (FS)****4.1 Correspondence**

1. Letter from Benjamin Moore, EPA Region IV, to Mariam Tehrani, Akzo Chemicals Inc. (September 07, 1988) Decision to conduct a biological study of the Cold Creek Swamp and other matters.
2. Letter from Camilla Bond Warren, EPA Region IV to Mariam R. Tehrani, Akzo Chemicals, Inc. (July 12, 1989) Proposed meeting to discuss EPA Proposed Plan.

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**4.0 FEASIBILITY STUDY (FS)****4.4 Work Plans and Progress Reports**

1. Cross Reference: "Final Work Plan for Stauffer Chemical Cold Creek and LeMoyne Sites - Remedial Investigation/Feasibility Study - Mobile County, Alabama - Volume I," Camp Dresser & McKee Inc. (August 27, 1985) [Filed and cited in Entry Number 1 of 3.4 REMEDIAL INVESTIGATION (RI) - Work Plans and Progress Reports]
2. Cross Reference: "Final Work Plan for Stauffer Chemical Cold Creek and LeMoyne Sites - Remedial Investigation/Feasibility Study - Mobile County, Alabama - Volume II," Camp Dresser & McKee Inc. (August 27, 1985) [Filed and cited in Entry Number 2 of 3.4 REMEDIAL INVESTIGATION (RI) - Work Plans and Progress Reports]
3. Cross Reference: "Amendment to Work Plan for Stauffer Chemical Company Sites - Mobile County, Alabama - Volume II," Camp Dresser & McKee Inc. (August 01, 1988) [Filed and cited in Entry Number 3 of 3.4 REMEDIAL INVESTIGATION (RI) - Work Plans and Progress Reports]
4. "Bioaccumulation Study Work Plan for Akzo Chemical Inc., Axis, Alabama," Jeffrey Reidenauer, BCM Converse Inc. (October 1988)
5. Letter from Benjamin Moore, EPA Region IV, to Mariam Tehrani, Akzo Chemicals Inc. (October 26, 1988) Receipt of the October 1988 "Bioaccumulation Study Work Plan for Akzo Chemical Inc., Axis, Alabama," Jeffrey Reidenauer, BCM Converse Inc.

**4.7 Applicable or Relevant and Appropriate Requirements (ARARs)**

1. Letter from Diane Scott, EPA Region IV, to Charles Horn, State of Alabama Department of Environmental Management. (May 30, 1989) Alabama water quality criteria as applicable to the Stauffer Chemical Co. sites.
2. Letter in response to May 30, 1989 letter of Diane Scott, EPA Region IV from Sonja S. Massey, State of Alabama Department of Environmental Management. (July 10, 1989)

**4.8 Interim Deliverables**

1. "Stauffer Chemical Company - Cold Creek and LeMoyne Sites, Mobile, Alabama - Contaminant Transport Modeling - Final Report," Camp Dresser & McKee Inc. (June 30, 1988)

**4.9 Feasibility Study (FS) Reports**

1. Letter from Benjamin Moore, EPA Region IV, to Mariam Tehrani, Akzo Chemicals Inc. (September 07, 1988) Concerning comments on the draft "Feasibility Study Report for the Cold Creek/LeMoyne Site, Mobile County, Alabama".
2. Cross Reference: Letter from Lee Erickson, ICI Americas Inc., to Benjamin Moore, EPA Region IV. (September 22, 1988) Responding to EPA Region IV comments on the draft "Remedial Investigation Report for the Cold Creek/LeMoyne Site, Mobile County, Alabama" (revision 2). [Filed and cited in Entry Number 10 of 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]
3. Letter from Mariam Tehrani, Akzo Chemicals Inc., to Benjamin Moore, EPA Region IV. (September 28, 1988) Responding to Mr. Moore's comments of September 7, 1988.
4. Letter from Benjamin Moore, EPA Region IV, to Mariam Tehrani, Akzo Chemicals Inc. (November 16, 1988) Additional comments on the draft "Feasibility Study Report for the Cold Creek/LeMoyne Site, Mobile County, Alabama".

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**4.0 FEASIBILITY STUDY (FS)****4.9 Feasibility Study (FS) Reports**

5. Letter from Benjamin Moore, EPA Region IV, to Mariam Tehrani, Akzo Chemicals Inc. (January 24, 1989) Comments on the draft "Feasibility Study Report for the Cold Creek/LeMoyne Site, Mobile County, Alabama".
6. Meeting Agenda, EPA Region IV and Akzo Chemicals Inc. (March 16, 1989) Discussion of comments on the draft "Feasibility Study Report for the Cold Creek/LeMoyne Site, Mobile County, Alabama".
7. Letter from Patrick Tobin, EPA Region IV, to Mariam Tehrani, Akzo Chemicals Inc. (March 24, 1989) Transmitting a summary of the March 16, 1989, Stauffer Feasibility Study Review Meeting between representatives of EPA Region IV and Akzo Chemicals Inc.
8. Letter from Mariam Tehrani, Akzo Chemicals Inc., to Patrick Tobin, EPA Region IV. (April 06, 1989) Responding to EPA Region IV comments on the draft "Feasibility Study Report for the Cold Creek/LeMoyne Site, Mobile County, Alabama".
9. Letter from Lee Erickson, ICI Americas Inc., to Patrick Tobin, EPA Region IV, with Attachments. (April 13, 1989) Responding to EPA Region IV comments on the draft "Feasibility Study Report for the Cold Creek/LeMoyne Site, Mobile County, Alabama".
10. Letter from Diane Scott, EPA Region IV, to Mariam Tehrani, Akzo Chemicals Inc. (April 21, 1989) Responding to Ms. Tehrani's letter of April 6, 1989, to Patrick Tobin.
11. Letter from Diane Scott, EPA Region IV, to Mariam Tehrani, Akzo Chemicals Inc. (May 11, 1989) Point of Compliance wells at the Stauffer Chemical Co. sites.
12. "Feasibility Study for the Cold Creek and LeMoyne Sites, Mobile County, Alabama," ENSR Consulting and Engineering for Akzo Chemicals Inc. and ICI Americas Inc. (June 1989)
13. Letter from Diane Scott, EPA Region IV, to James Hathcock, State of Alabama Department of Environmental Management. (June 22, 1989) Transmitting the draft Proposed Plan and the "Feasibility Study for the Cold Creek and LeMoyne Sites, Mobile County, Alabama," ENSR Consulting and Engineering for Akzo Chemicals Inc. and ICI Americas Inc.
14. "Addendum to Feasibility Study Report; Stauffer Chemical LeMoyne and Cold Creek Sites," Diane Scott, EPA Region IV. (July 11, 1989)
15. A letter from Patrick M. Tobin, EPA Region IV to Mariam Tehrani, Akzo Chemicals, Inc. (August 22, 1989) Disapproval in part of Final Feasibility Study Report.
16. Letter from Michael W. Steinberg, ICI Americas Inc. to Camilla Bond Warren, EPA Region IV. (August 22, 1989) Acceptable drinking water levels for thiocarbamates.
17. Letter from T. P. Pastoor, ICI Americas Inc. to Camilla Bond Warren, EPA Region IV. (August 28, 1989) Acceptable drinking water levels for thiocarbamates.
18. Letter from Wayne R. Hillebrecht, ICI Agricultural Products to Diane Scott, EPA Region IV. (September 11, 1989) Acceptable drinking water levels for thiocarbamates.
19. Letter from Michael W. Steinberg, ICI Americas Inc. to Diane Scott, EPA Region IV. (September 15, 1989) Objection to partial disapproval of Final Feasibility Study Report.
20. Letter from Diane M. Scott, EPA Region IV to Michael W. Steinberg, Morgan, Lewis & Bockius [ICI Americas Inc.] (September 22, 1989) Acceptable drinking water levels for thiocarbamates.

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**4.0 FEASIBILITY STUDY (FS)****4.9 Feasibility Study (FS) Reports**

21. Letter from Lee E. Erickson, ICI Americas Inc. to Diane Scott, EPA Region IV. (September 22, 1989) Acceptable drinking water levels for thiocarbamates.
22. Letter from Mariam R. Tehrani, Akzo Chemicals Inc. to Jim McGuire, EPA Region IV. (April 17, 1990) Transmittal of revised pages for the Feasibility Study report.

**4.10 Proposed Plans for Selected Remedial Action**

1. "EPA Announces Proposed Plan," EPA Region IV. (July 11, 1989)

**5.0 RECORD OF DECISION (ROD)****5.1 Correspondence**

1. Letter from James Scarbrough, EPA Region IV, to Mariam Tehrani, Akzo Chemicals Inc. (March 17, 1988) Need for a "letter of request" from Akzo for an extension of their Record of Decision date.
2. Letter from Mariam Tehrani, Akzo Chemicals Inc., to Lee DeHihns, EPA Region IV. (March 24, 1988) Request that the deadline for the Record of Decision be extended to February 1, 1989.
3. Letter from Diane M. Scott, EPA Region IV to James Hathcock, State of Alabama Department of Environmental Management. (August 01, 1989) Transmittal of draft Record of Decision for Operable Unit 1.
4. Memorandum from Diane M. Scott, EPA Region IV to Camilla B. Warren, EPA Region IV. (February 13, 1990) New information concerning cleanup goals for the Stauffer Chemical LeMoyne and Cold Creek sites.

**5.2 Responsiveness Summaries**

1. "Responsiveness Summary for the Proposed Remedial Action Plan at the Stauffer Chemical LeMoyne and Cold Creek Sites, Mobile, Alabama," Booz Allen & Hamilton Inc. for EPA Region IV. (September 1989)

**5.9 Record of Decision (ROD)**

1. "Record of Decision: Ground Water Treatment Operable Unit," EPA Region IV. (September 27, 1989) Record of Decision for Operable Unit 1, Stauffer Chemical/LeMoyne and Stauffer Chemical/Axis Superfund sites.
2. Letter from Joseph Downey, State of Alabama Department of Environmental Management to Arthur L. Collins, EPA Region IV. (September 29, 1989) Review of Record of Decision for Operable Unit 1.

**10.0 ENFORCEMENT****10.11 EPA Administrative Orders**

1. Letter from Wendy Tisch, Stauffer Chemical Company, to Anne Heard, EPA Region IV. (October 15, 1985) Comments on the draft Administrative Order on Consent, In the Matter of Stauffer Chemical Company Sites, LeMoyne and Cold Creek Plants, Mobile County, Alabama.

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**10.0 ENFORCEMENT**

**10.11 EPA Administrative Orders**

2. Administrative Order on Consent, In the Matter of Stauffer Chemical Company Sites, LeMoyne and Cold Creek Plants, Mobile County, Alabama, Stauffer Chemical Company, Respondent, Docket No. 86-04-C. (January 21, 1986)

**10.12 EPA Consent Decrees**

1. Letter from Patrick Tobin, EPA Region IV, to Steve Perry, Akzo Chemicals Inc. (October 14, 1988) Status of the consent decree to be issued by EPA Region IV to Akzo Chemicals Inc. and ICI Americas.

**11.0 POTENTIALLY RESPONSIBLE PARTIES (PRP)**

**11.9 PRP-Specific Correspondence**

1. Letter from Harold W. Taylor, Jr., EPA Region IV to F. Michels, Stauffer Chemical Company, Inc. (DATE UNKNOWN) Pages to correct notice letter sent November 23, 1984.
2. Letter from Thomas W. Devine, EPA Region IV to J. J. Burke, Stauffer Chemical Company, Inc. (November 21, 1984) Notification of possible Potentially Responsible Party status.
3. Letter from Thomas W. Devine, EPA Region IV to F. Michels, Stauffer Chemical Company, Inc. (November 23, 1984) Notification of possible Potentially Responsible Party status.
4. Letter from J.D. Sheehan, Stauffer Chemical Company, to James Orban, EPA Region IV. (December 21, 1984) Participation by Stauffer Chemical Company in a remedial investigation and feasibility study at Stauffer's Cold Creek plant.
5. Letter from J. D. Sheehan, Stauffer Chemical Company to James Orban, EPA Region IV. (January 31, 1985) Continuation of response to EPA Region IV November 23, 1984, information request.

**13.0 COMMUNITY RELATIONS**

**13.3 Scopes of Work**

1. "Statement of Work - Community Relations Plan - Stauffer NPL Sites, Mobile County, Mobile, Alabama," EPA Region IV [1988]. (DATE UNKNOWN)

**13.6 Community Relations Plans**

1. "Final Community Relations Plan - Stauffer Chemical Company Sites - Remedial Investigation/Feasibility Study," Camp Dresser & McKee Inc. (September 04, 1985)

**13.8 Public Meetings**

1. Letter from John G. Cwiek, Camp Dresser & McKee, Inc. to Diane Scott, EPA Region IV. (December 04, 1989) Transmittal of Revised Public Meeting Official Transcript for meeting held July 27, 1989.

**13.9 Fact Sheets**

1. "Remedial Investigation/Feasibility Study Fact Sheet - Stauffer Chemical Company Site - Mobile County, Alabama," EPA Region IV. (May 1986)

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**16.0 NATURAL RESOURCE TRUSTEE**

**16.1 Correspondence**

1. A letter from Bruce Blanchard, U.S. Department of the Interior, to Gene Lucero, EPA Headquarters. (January 16, 1987) Results of a preliminary natural resources survey of the Stauffer Chemical Co. Cold Creek Plant site.
2. Letter from Bruce Blanchard, U.S. Department of the Interior, to Gene Lucero, EPA Headquarters. (January 16, 1987) Results of a preliminary natural resources survey of the Stauffer Chemical Co. Axis Plant site.

**16.5 Technical Issue Papers**

1. "Preliminary Natural Resource Survey - Stauffer Chemical Company LeMoyne Plant, Axis, Alabama," U.S. Fish and Wildlife Service. (December 1986)